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Of Attorneys for Defendant Cottage Grove Chevrolet, Inc., dba Brad's Cottage  
Grove Chevrolet

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Eugene Division

STACEY RANDALL, an individual,  
  
Plaintiff,  
  
v.  
  
COTTAGE GROVE CHEVROLET, INC.,  
dba BRAD'S COTTAGE GROVE  
CHEVROLET,  
  
Defendant.

Case No. 6:18-cv-01207-TC

**DECLARATION OF HELAINA CHINN IN  
SUPPORT OF DEFENDANT'S  
UNOPPOSED MOTION TO EXTEND  
PRETRIAL DEADLINES**

I, Helaina Chinn, do declare and state as follows:

1. I am one of the attorneys for defendant Cottage Grove Chevrolet, Inc. ("defendant") in this matter. I make this declaration in support of Defendant's Unopposed Motion to Extend Pretrial Deadlines. This declaration is based on my personal knowledge of the facts and circumstances of this matter. I am competent to testify as to the matters stated herein.

2. The parties to this case have attempted to make good use of the prior time provided in the schedule.

3. The discovery in this matter is ongoing and both parties have experienced some delays in completing discovery.

4. The parties need additional time in order to complete discovery, and an opportunity to do so may facilitate the resolution of this matter.

**Pursuant to 28 U.S.C. § 1746 I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.**

Dated this 28th day of February, 2019.

**BODYFELT MOUNT LLP**

BY: s/ Helaina L. Chinn

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Trial Attorney: Skip Winters, OSB No. 944669

Of Attorneys for Defendant Cottage Grove  
Chevrolet, Inc., dba Brad's Cottage Grove Chevrolet

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing **DECLARATION OF HELAINA CHINN IN SUPPORT OF DEFENDANT'S UNOPPOSED MOTION TO EXTEND PRETRIAL DEADLINES** on the following attorneys on the date noted below by the method indicated:

Andrew Lewinter  
Andrew Lewinter, Attorney, P.C.  
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Eugene, OR 97401  
Fax: (541) 686-1300  
Email: Andrew@lewinterlaw.com  
*Of Attorneys for Plaintiff Stacey Randall*

Method: ☐ US Mail, postage prepaid  
☐ Facsimile  
☐ Hand Delivery  
☒ CM/ECF Electronic Service

Dated this 28th day of February, 2019.

BY: s/ Helaina L. Chinn

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Chevrolet, Inc., dba Brad's Cottage Grove Chevrolet